

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

STACEY METSIKAS

Debtors.

CHAPTER 13

CASE NO. 21-12222 (AMC)

**EXPEDITED MOTION FOR AUTHORITY/APPROVAL
FOR SALE OF REAL ESTATE**

The Debtor, Stacey Metsikas, by and through her attorney, Alex Moretsky, hereby moves the Court for expedited approval of the sale of real property known as 66 Penn Oak Trail, Newtown, PA 18940, and in support states as follows:

1. On August 12, 2021 (the “Petition Date”), the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. The Debtor and her non-debtor spouse own real property located at 66 Penn Oak Trail, Newtown, Pennsylvania (the “Property”).
3. The Debtor’s chapter 13 plan of reorganization (the “Plan”) calls for the sale of the Property.
4. The success of the reorganization is dependent, in large part, on the sale of the Property because the proceeds will pay Debtor’s secured creditors, as well as any remaining unsecured claims.
5. On November 5, 2021, the Debtor filed an application to employ Keller Williams Real Estate of Newtown as Real Estate Broker (the “Application”) to market and sell the Property. See Dckt. #35.

6. On January 4, 2022, the Court entered an order granting the Application. See Dckt. #59.

7. On or about March 7, 2022, the Debtor and her non-debtor spouse entered into an agreement of sale (the “Sale Agreement”) for the sale of the Property. A true and correct copy of the Sale Agreement is attached hereto and marked Exhibit “A”.

8. The Sale Agreement reflects the highest and best price offer received by the Debtor for the purchase of the Property, taking into consideration the condition of the subject premises and other offers proposed by other parties.

9. All valid liens, as well as customary fees and costs associated with a real estate closing including realtor’s commissions, will be paid at the time of settlement. A true and correct copy of the ALTA is attached hereto and marked Exhibit “B”.

10. Pursuant to the terms of the Sale Agreement, settlement is to take place on or before April 28, 2022.

11. The buyers have indicated that they are currently renting an apartment and the lease will expire on May 1, 2022.

12. After discussions with their landlord, the landlord agreed to allow them to stay two (2) additional weeks, at which point they have to move out because the landlord secured new tenants.

13. The buyers further indicated that they will not extend the Sale Agreement past May 14, 2022.

14. In order to avoid the potential loss of the buyers, Debtor respectfully requests an expedited hearing because the settlement must occur no later than May 14, 2022, or the buyers will terminate the transaction.

15. The Debtor wishes to ensure that settlement of the Property may proceed and proceeds from the sale go to the Debtor's estate following disbursement of commissions, and satisfaction of the mortgages and other liens, if any.

WHEREFORE, the Debtor requests that this Court grant the relief requested herein and such other relief as this Court deems just and proper.

Dated: April 27, 2022

/s/ Alex Moretsky, Esquire
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